

Date	Attorney	Hours	Bill Rate	Amount	Memo
11/2/2022	EL	0.2	\$300.00	\$60.00	Review ECF bounce with USDJ Order denying motion for attorneys' fees, conference with atty and DL regarding same;
11/3/2022	EL	0.2	\$300.00	\$60.00	Review ECF bounce from Court with USDJ Order granting extension of time to file letter response in opposition to letter motion for pre-motion conference and extending Vito's deadline to respond to complaint; correspondence with atty regarding [REDACTED]; conference with atty and DL regarding strategy;
11/4/2022	EL	0.5	\$300.00	\$150.00	Conference call with attorneys
11/4/2022	EL	0.6	\$300.00	\$180.00	Correspondence with attys regarding strategy ; review reply correspondence, conference with attys regarding strategic developments; review reply correspondence and discuss with attys,
11/7/2022	EL	0.6	\$300.00	\$180.00	Conference call with attys and DL
11/9/2022	EL	0.1	\$300.00	\$30.00	Conference with attys, review correspondence with forensic analyst regarding production.
11/10/2022	EL	0.5	\$300.00	\$150.00	Correspondence with attys regarding Defendants' property for sale; conference with attys regarding GPS device; conference and correspondence with private investigator regarding same; review letter re defamation claim; conference with attys regarding same and private investigator; review correspondence with private investigator providing authorization to move forward with investigation;
11/11/2022	EL	0.5	\$300.00	\$150.00	Review Correspondence with forensic analyst regarding update; correspondence and conference with atty re forensic analyst; review ECF bounce from opposing counsel with reply letter regarding defamation claim; correspondence with attys regarding same.
11/12/2022	EL	0.2	\$300.00	\$60.00	Correspondence with Roa, attys, and private investigator regarding canvas; conference with private investigator and attys; review and discussions with attys regarding videos found by Roa.
11/13/2022	EL	0.1	\$300.00	\$30.00	Correspondence with private investigator and attys regarding status of investigation.
11/14/2022	EL	0.1	\$300.00	\$30.00	E-mail correspondence with attorneys regarding contempt motion
11/15/2022	EL	0.3	\$300.00	\$90.00	Correspondence and conference with private investigator regarding developments with investigation; telephone correspondence with [REDACTED] regarding affidavit.

11/16/2022	EL	1	\$300.00	\$300.00	Correspondence with attorneys regarding photos for [REDACTED] affidavit; correspondence with attorneys regarding response from GoDaddy regarding subpoena and payment for same; review correspondence with Roa and private investigator regarding investigation and termination thereof; correspondence with attorneys regarding same; conference with attorneys regarding same and private investigator.
11/17/2022	EL	0.4	\$300.00	\$120.00	Correspondence with private investigator regarding conference; conduct conference with private investigator regarding case; conference with private investigator regarding strategy; correspondence with Shalit, Roa, and attorneys regarding action for pre-suit discovery; conference with attorneys regarding case; review correspondence with forensic analyst regarding discovery; review correspondence with private investigator regarding contact information for assigned detective.
11/19/2022	EL	0.1	\$300.00	\$30.00	Conference with attorneys regarding private detective return.
11/23/2022	EL	0.5	\$300.00	\$150.00	review joint cooperation agreement; correspondence with attys and, Roa, JSF, regarding communication to private investigator; review correspondence with private investigator regarding release.
11/29/2022	EL	0.5	\$300.00	\$150.00	Collect and analyze domain names to be sent to forensic analyst, Correspondence with atty regarding domain name list to be sent to forensic analyst, and first production of documents by forensic analyst; review correspondence from forensic analyst with invoice; correspondence with attys regarding status of Roa release and investigation.
11/30/2022	EL	0.5	\$300.00	\$150.00	correspondence with attys regarding Defendants' violation of temporary restraining Order; correspondence with attys re invoice from forensic analyst; review correspondence with forensic analyst regarding submission of same; review correspondence with forensic analyst regarding balances due and request for statement of account; review correspondence with forensic analyst and attys regarding same; review correspondence with private investigator regarding video enhancement; review consent letter motion and proposed scheduling Order;
12/1/2022	EL	0.1	\$300.00	\$30.00	Phone call with Carlos and DL regarding joint agreement and obtaining counsel for GPS state case

12/1/2022	EL	0.6	\$300.00	\$180.00	Correspondence with attys regarding Defendants' contempt; correspondence with attys regarding forensic analyst's failure to produce documents; correspondence with attys regarding Roa; [REDACTED]; conference with Shalit and client regarding [REDACTED]; correspondence with client regarding [REDACTED] revise joint cooperation agreement and submit same to Shalit, client, and JSF via email; correspondence with Roa, private investigator, Shalit, and client regarding [REDACTED] forward same to JSF via email with correspondence regarding same; correspondence with client regarding invoice from forensic analyst; correspondence and conference with private investigator regarding NYPD Detective's findings concerning Staten Island private investigator; correspondence with JMK regarding meeting; draft preservation letter to Land Sea Air and submit same to Shalit and JMK via email; forward same to client, private investigator, and JSF via email.
12/2/2022	EL	0.1	\$300.00	\$30.00	Review correspondence from Shalit with executed counterpart to joint cooperation agreement; review correspondence from attys with executed counterpart; review reply correspondence from Shalit regarding same;
12/4/2022	EL	0.1	\$300.00	\$30.00	Correspondence with attys regarding case.
12/5/2022	EL	0.4	\$300.00	\$120.00	Correspondence with atty, Shalit, Roa, and client regarding and attaching fully executed joint cooperation agreement; correspondence with attys regarding appearance before USDJ Chen tomorrow; correspondence with private investigator regarding conference; conference with attys regarding strategy; correspondence with attys regarding invoices from forensic examiner.
12/6/2022	EL	0.4	\$300.00	\$120.00	Interoffice meeting with E. Kataev
12/6/2022	EL	0.2	\$300.00	\$60.00	Correspondence with attys regarding private investigator regarding and developments of [REDACTED]; review ECF bounce from Court with USDJ minute entry for proceedings held on pre-motion conference; correspondence with BRG and client regarding payment; conference and correspondence with client regarding John Doe lawsuit in federal court and lack of subject matter jurisdiction for same;
12/8/2022	EL	0.5	\$300.00	\$150.00	review correspondence from forensic analyst addressing points; correspondence with attys regarding contents and conference to discuss same; virtual meeting to review and respond to forensic analyst's response; correspondence with attys regarding revisions to petition for pre-action disclosure;

12/10/2022	EL	0.2	\$300.00	\$60.00	review Correspondence with private investigator regarding update on investigation; review correspondence with private investigator regarding billing; correspondence with Roa and attys regarding question by investigator;
12/12/2022	EL	0.8	\$300.00	\$240.00	review Correspondence with additional counsel for Roa regarding appearance on Order to show cause, subpoenas, and service by publication, and signed Order to show cause review correspondence with private investigator regarding Stanulis; review correspondence with private investigator regarding device information; review correspondence with private investigator regarding photos of Safa & Vito; review correspondence with private investigator regarding picture of device with serial number; review preservation letter to Land Air Sea with private investigator;
12/13/2022	EL	0.3	\$300.00	\$90.00	review Correspondence with private investigator regarding address for Stanulis; review correspondence with Roa's additional counsel, regarding executed subpoena; correspondence with attys, Roa, and his additional counsel regarding Roa's additional counsel unavailability; conference with atty regarding private investigator payments
12/14/2022	EL	0.6	\$300.00	\$180.00	Correspondence with atty regarding reimbursement for private investigator; review correspondence with Roa's additional counsel regarding Order to show cause; review correspondence with court reporter and opposing counsel regarding transcript; review correspondence with private investigator and atty regarding request to serve subpoena; review correspondence with Roa's additional counsel regarding conference to discuss case; correspondence and conference with private investigator regarding strategy; correspondence with Roa and attys regarding pictures of Defendants' henchmen.
12/17/2022	EL	0.3	\$300.00	\$90.00	review correspondence and conference with forensic analyst regarding billing, correspondence with attys regarding Defendants' contact with our customers.
12/20/2022	EL	2	\$300.00	\$600.00	
12/20/2022	EL	2	\$300.00	\$600.00	Correspondence with Roa and atty regarding expert witness for cybersecurity; correspondence with atty regarding pre-virtual meeting conference; conference with private investigator regarding Stanulis license; assistance with gathering and analyzing financials for comparison between WatchDog & Companions; conduct pre-virtual meeting conference with atty; review correspondence with private investigator regarding conference

12/21/2022	EL	1	\$300.00	\$300.00	review Correspondence with Roa regarding breakdown of sales by customer between our client and Defendants; review correspondence with additional counsel for Roa regarding virtual meeting; virtual meeting with Roa's additional counsel regarding status, developments, and next steps; ; correspondence with attys
12/23/2022	EL	0.9	\$300.00	\$270.00	Ereview correspondence with Roa's additional counsel regarding contact by Stanulis' attorney for conference; review correspondence with client and private investigator regarding same; conference with private investigator regarding strategy with Stanulis; conference with Stanulis;
12/25/2022	EL	2	\$300.00	\$600.00	correspondence with attys regarding Defendants' formation of IME GuardDog Inc and related matters; review documents on Relativity; correspondence with attys regarding specific set of documents consisting of training materials utilized by Defendants; review correspondence with private investigator regarding moving conference; review correspondence with Roa's additional counsel regarding same; .
12/26/2022	EL	1	\$300.00	\$300.00	correspondence with atty regarding Defendants' accountant and the addresses for his office; review correspondence with Roa's additional counsel regarding service by publication; review correspondence from Roa's additional counsel to counsel for Stanulis; review correspondence with Roa's additional counsel and private investigator regarding conference to discuss plan for call with Stanulis' counsel; conduct conference with Roa's additional counsel and private investigator to prepare for call; correspondence with Roa's additional counsel regarding same; calendar conference with Stanulis' counsel; conduct conference with Stanulis' counsel, Roa's additional counsel, and private investigator; conduct post-mortem conference with private investigator; conference with Roa's additional counsel; conference with atty regrding update on Stanulis; review correspondence with Roa's additional counsel regarding coordination of deposition date; correspondence with forensic analyst and opposing counsel regarding discovery and download functionality on Relativity;
12/28/2022	EL	0.1	\$300.00	\$30.00	Correspondence with attys
12/29/2022	EL	0.2	\$300.00	\$60.00	review Correspondence with Roa's additional counsel regarding Stanulis' deposition start time; correspondence with atty regarding strategy email;

1/2/2023	EL	0.4	\$300.00	\$120.00	review Correspondence with atty, Roa, and JSF regarding attempted conference with clerk's office concerning issuance of summons; [REDACTED] [REDACTED] correspondence with atty forwarding email from process server regarding cost of service by publication;
1/4/2023	EL	0.2	\$300.00	\$60.00	Conference with atty regarding case and developments; review correspondence with Roa's additional counsel and process server regarding service by publication.
1/7/2023	EL	0.3	\$300.00	\$90.00	review correspondence with Roa's additional counsel regarding documents from Stanulis, deposition start time, and advance notification of motion for sanctions for failure to appear; conference with atty regarding strategy, discovery, depositions, and summary judgment.
1/12/2023	EL	0.8	\$300.00	\$240.00	Correspondence with atty, Roa, and intellectual property counsel regarding website comparisons in advance of virtual meeting today;n.
1/13/2023	EL	1	\$300.00	\$300.00	conference with attys
1/18/2023	EL	0.8	\$300.00	\$240.00	review Correspondence with Roa's additional counsel, client, and private investigator regarding motion for contempt; review correspondence with client, Roa's additional counsel, and Roa regarding [REDACTED] concerning quote for service by publication; review correspondence with process server regarding status of service by publication; correspondence with attys regarding relief from service by publication; correspondence with [REDACTED] and client regarding service by publication;
1/24/2023	EL	0.1	\$300.00	\$30.00	Review PI's contract with Safa
1/27/2023	EL	0.4	\$300.00	\$120.00	review Correspondence with Roa's additional counsel, client, and private investigator regarding subpoenas; correspondence with Roa's additional counsel and process server concerning same and whether any attempts were made; review correspondence with private investigator regarding subpoena to Tom Brandon;

2/5/2023	EL	2	\$300.00	\$600.00	Review correspondence with Roa's additional counsel, Roa, and private investigator regarding service of subpoena upon Thomas Brandon; conference with private investigator regarding Thomas Brandon; review correspondence with private investigator, atty and Roa's additional counsel regarding and attaching subpoena to Thomas Brandon with instructions concerning same and requests for information from Roa's additional counsel; conference with private investigator, and Roa's additional counsel with request to amend and refile subpoena prior to service; review extensive correspondence with Roa's additional counsel, Roa, atty and private investigator regarding provision of recording prior to service of subpoena upon Thomas Brandon;
2/7/2023	EL	0.2	\$300.00	\$60.00	call with atty
2/8/2023	EL	0.2	\$300.00	\$60.00	Conference and correspondence with atty regarding case status, next steps, and regarding strategy concerning pre-action disclosure case
2/9/2023	EL	0.2	\$300.00	\$60.00	Read pre-motion conference letter; reviewed e-mail correspondence with E. Kataev
2/10/2023	EL	0.4	\$300.00	\$120.00	call and review docs re injunction motion
2/12/2023	EL	1	\$300.00	\$300.00	call and review docs re injunction motion
2/13/2023	EL	0.3	\$300.00	\$90.00	Review outline for motion for preliminary injunction
2/16/2023	EL	0.5	\$300.00	\$150.00	Review and revise OSC
2/17/2023	EL	0.2	\$300.00	\$60.00	Review memorandum of law in support of Order to show cause for sanctions;
2/17/2023	EL	0.4	\$300.00	\$120.00	Review and revise MOL in support of renewed OSC
2/18/2023	EL	0.6	\$300.00	\$180.00	Review correspondence with Roa, regarding Florida property; correspondence regarding revisions to memorandum of law in support of Order to show cause for contempt; conference with atty regarding contempt motion;
2/19/2023	EL	1.3	\$300.00	\$390.00	Correspondence with attyt regarding Order to show cause;
2/21/2023	EL	0.4	\$300.00	\$120.00	Review correspondence with Roa's additional counsel, Roa, and client regarding Stanulis; review ECF bounce from opposing counsel with motion to dismiss cause of action for defamation; continue revising declaration of Roa in support of Order to show cause for contempt.
2/25/2023	EL	0.5	\$300.00	\$150.00	Conference with attys
2/26/2023	EL	1.5	\$300.00	\$450.00	conference with a atty regarding action items; regarding questions to Stanulis and subpoena to Division of Licensing Services; conference with Roa, private investigator, a
2/27/2023	EL	1.5	\$300.00	\$450.00	Review and revise reply brief; revise renewed motion for preliminary injunction
3/1/2023	EL	0.1	\$300.00	\$30.00	Review Correspondence with counseing documents;



3/2/2023	EL	2.5	\$300.00	\$750.00	Conference call atty, review motion for attachment
3/3/2023	EL	0.2	\$300.00	\$60.00	Correspondence with atty regarding revisions to proposed Order to show cause;
3/3/2023	EL	1	\$300.00	\$300.00	review motion for attachment
3/5/2023	EL	0.1	\$300.00	\$30.00	Correspondence with atty regarding Order to show cause for contempt.
3/7/2023	EL	1	\$300.00	\$300.00	Review and revise renewed motion for injunction;
3/8/2023	EL	1.6	\$300.00	\$480.00	Review and revise memorandum of law in support of renewed motion for injunction
3/8/2023	EL	1	\$300.00	\$300.00	review and revise Roa's declaration in support; submit same with all accompanying exhibits review reply correspondence from client with revisions to same; review and revise memorandum of law in support;
3/9/2023	EL	1.2	\$300.00	\$360.00	Review and revise memorandum of law in support of renewed injunction and declarations
3/10/2023	EL	1.2	\$300.00	\$360.00	Final revisions to memorandum of law and declarations in support of renewed motion for injunction;
3/10/2023	EL	2	\$300.00	\$600.00	Correspondence atty re motion for contempt
3/11/2023	EL	0.2	\$300.00	\$60.00	call with atty
3/12/2023	EL	1.5	\$300.00	\$450.00	Correspondence with atty regarding case; calendar hearing and motion submission deadlines; Land Air Sea Systems; prepare addendum for Land Air Sea Systems.
3/13/2023	EL	0.9	\$300.00	\$270.00	meeting with atty listen to Stanulis recordings
3/13/2023	EL	1	\$300.00	\$300.00	Correspondence with counsel
3/14/2023	EL	1	\$300.00	\$300.00	Correspondence with atty regarding strategy and efforts to obtain proof of violations of the temporary restraining Order; discuss forwarding Land Air Sea subpoena materials received; correspondence with Roa, private investigator,
3/15/2023	EL	1	\$300.00	\$300.00	call with atty
3/17/2023	EL	0.5	\$300.00	\$150.00	Review opposition to motion for renewed injunction
3/17/2023	EL	1.5	\$300.00	\$450.00	review Correspondence with Roa, and atty re declaration of [REDACTED] to show violation of temporary restraining Order; conference; conference with private investigator regarding strategy and upcoming meeting.
3/19/2023	EL	2	\$300.00	\$600.00	Conduct strategy meeting with atty and private investigator;
3/20/2023	EL	1	\$300.00	\$300.00	Correspondence with atty
3/22/2023	EL	1.5	\$300.00	\$450.00	Review reply in further support of renewed motion for injunction;
3/22/2023	EL	2	\$300.00	\$600.00	review reply memorandum of law in further support of second motion for injunctive relief;



3/23/2023	EL	1.5	\$300.00	\$450.00	Correspondence with atty regarding meeting to prepare motion binders; conference with private investigator regarding hearing preparation;
3/24/2023	EL	1	\$300.00	\$300.00	conference with attys
3/25/2023	EL	2.5	\$300.00	\$740.00	Prepare for hearing
3/25/2023	EL	2	\$300.00	\$600.00	Correspondence with atty and Roa regarding exhibits;
3/26/2023	EL	3	\$300.00	\$900.00	Prepare for hearing
3/26/2023	EL	3	\$300.00	\$900.00	Review ECF bounce from Court with USDJ Order granting letter motion to compel; correspondence atty and private investigator regarding meeting location for pre-hearing strategy session; c
3/27/2023	EL	1	\$300.00	\$300.00	review oral argument outline
	Totals	75.9		\$22,760.00	